

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et al.,

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION SUBMITTING ELEVENTH BI-ANNUAL STATUS REPORT
PURSUANT TO PARAGRAPH 261 AND
REQUEST FOR LEAVE TO FILE IN THE SPANISH LANGUAGE**

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Department (“PRPB”), by and through the undersigned counsel, and respectfully inform the Court as follows:

1. Pursuant to Paragraph 261 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department (the “Agreement”), the PRPB herein files its bi-annual status report (the “Status Report”) on the progress made in the implementation of the Agreement, as well as responds to issues raised by the Monitor in its CMR-1. Docket No. 57, ¶261. After requesting and obtaining extensions of time to file the Status Report up and until today, June 24, 2020, the PRPB is now filing its Eleventh Bi-Annual Status Report.

2. The Status Report was prepared by the PRPB in the Spanish language. Accordingly, the PRPB hereby requests leave to file the Status Report in Spanish, and that thirty (30) days to file a translated version of said documents be granted.

WHEREFORE, PRPB respectfully requests the Court to take notice of the above, and grant (a) leave to file the Status Report in Spanish and (b) an extension of time of thirty (30) days to submit the English translation.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 24th day of June, 2019.

By:

s/ Arturo J. Garcia Sola
Arturo J. Garcia Sola
USDC-PR No. 201903
ajg@mcvpr.com

s/Lizzie M. Portela
Lizzie M. Portela
USDC-PR No. 208401
lpf@mcvpr.com

s/ Beatriz Annexy Guevara
Beatriz L. Annexy
USDC-PR No. 217505
ba@mcvpr.com

McCONNELL VALDÉS LLC
PO Box 364225
San Juan, PR 00936-4225
Telephone (787) 250-5641
Fax: (787) 759-8282